



B.Braun Medical - Request for Information

JeannaR Henry

to:

david.lauer

11/18/2011 10:14 AM

Cc:

henry.jeannar

Hide Details

From: JeannaR Henry/R3/USEPA/US

To: david.lauer@bbraun.com

Cc: henry.jeannar@epa.gov

Good Morning Mr. Lauer:

Thank you for getting back to me. Per your voicemail message, here are the follow-up questions I have regarding the May 2, 2011 Environmental Indicator (EI) Inspection that was conducted at B. Braun Medical, Inc. (PAD982679169) by Michael Baker Jr., Inc. (Baker) on behalf of EPA. Once you've had a chance to review the following questions, please let me know if you'd like to have a call to go over any or all of the questions in more detail. I would like to receive the requested information by Monday, November 28, 2011 so that I can complete both the Human Health and Groundwater EIs for this Facility.

Requested Information:

1. Please verify that the information contained in the following paragraph is factually correct. If any of the information below is incorrect, please provide the appropriate edits.

B. Braun Medical, Inc. (B. Braun) is a privately-owned health care company that provides healthcare products, services and educational programs that enhance the care and safety of patients and healthcare professionals in the fields of drug delivery, IV therapy, pain control, clinical nutrition, dialysis and vascular intervention. B. Braun's products and services are used in hospitals, outpatient surgery centers and in the home care setting. B. Braun's facility (herein after referred to as "B. Braun," "Facility," or "Site") located at 901 Marcon Boulevard in Hanover Township, Lehigh County, Pennsylvania, manufactures, prepares and sterilizes plastic disposable medical devices, such as valves, adapters, piercing devices, stopcocks, infusion pumps and systems, syringes, cannulae, regional anesthesia, balloon catheters, fluid administration systems, interventional products, and safety products.

2. The EI Report states that the Facility's original 285,000 square foot building was constructed in 1985, with an additional 75,000 square foot building constructed in 2009. Is the 75,000 square foot addition connected directly to the original building? How does B. Braun refer to each of the buildings (i.e. Main Building).

3. With respect to the Facility's elementary neutralization unit (ENU), please answer the following:

- (A) Which building (original or addition) houses the Facility's ENU?
- (B) When was the Facility's ENU installed?
- (C) When did the Facility's ENU begin operation?

4. According to the EI Report, the Facility's former Hazardous Waste Accumulation Area (HW Accumulation Area) was located on the east side of the Facility building, just outside of the main building. Please answer the following questions regarding the Facility's former HW Accumulation Area:

- (A) Please provide the dates (i.e., beginning/ending) of operation for the Facility's former HW Accumulation Area.
- (B) Please provide a detailed description of the former HW Accumulation Area and how it was constructed (e.g., fenced, covered, concrete or gravel base, etc.)
- (C) Please identify the types of waste and provide the EPA Hazardous Waste Code associated with the hazardous wastes stored in the former HW Accumulation Area.

5. The EI Report states that the Facility's current hazardous waste accumulation area is located on the north end of the property adjacent to the building. Please identify which building the current HW Accumulation Area is located adjacent to. Also, please identify the types of waste and provide the EPA Hazardous Waste Code associated with the hazardous wastes stored in the Facility's current HW Accumulation Area.

6. With respect to the Facility's use of ethylene oxide, please answer the following:

- (A) State the name of the room that is used to store raw material drums of ethylene oxide. Is this room also used for the storage of "empty" (used) ethylene oxide drums? If not, please identify the room where used drums of ethylene oxide are stored.
- (B) Does the Facility manage the used drums of ethylene oxide as a hazardous waste (U115)? If so, please provide a detailed narrative that explains how the Facility handles and manages its used drums of ethylene oxide. In your description, please include labeling and dating of drums, how drums are moved from area to area, employee training required for handling used drums of ethylene oxide, manifesting (provide an example copy), and information regarding the entity that receives the used drums of ethylene oxide from B. Braun.
- (C) If the Facility is not managing the used drums of ethylene oxide as a hazardous waste, please provide a detailed narrative that explains the Facility's rationale for not managing such drums as hazardous waste. If the drums are being managed as non-hazardous in accordance with a RCRA exemption or exclusion, please identify the exemption or exclusion. In addition, submit any and all supporting documentation (e.g., waste determination, EPA guidance letter, PADEP determination letter).

7. Please answer the following questions regarding Tank 001, emergency catch basin UST:

- (A) Please identify where Tank 001 is located at the Facility.
- (B) Has the Facility performed a hazardous waste determination on the liquid that is removed from Tank 001 routinely? If so, please state whether or not the liquid was determined to be hazardous (include EPA HW Code) and submit any and all supporting waste determination documentation (e.g., waste profile, sampling data).
- (C) Is the liquid removed from Tank 001 at the same time the 3,000-gallon above-ground storage tank (AST) associated with the Facility's ENU is emptied? If so, are the contents of Tank 001 and the 3,000-gallon AST co-mingled for off-site shipment?

Again, please let me know if you would like additional clarification on any of the questions above.
Thanks!

Jeanna R. Henry, Environmental Scientist
U.S. Environmental Protection Agency, Region III
Office of Pennsylvania Remediation
Phone: 215/814-2820
Fax: 215/814-3113

November 23, 2011

Subject: EPA Request for Information

1. Please verify that the information contained in the following paragraph is factually correct. If any of the information below is incorrect, please provide the appropriate edits.

B. Braun Medical, Inc. (B. Braun) is a privately-owned health care company that provides healthcare products, services and educational programs that enhance the care and safety of patients and healthcare professionals in the fields of drug delivery, IV therapy, pain control, clinical nutrition, dialysis and vascular intervention. B. Braun's products and services are used in hospitals, outpatient surgery centers and in the home care setting. B. Braun's facility (herein after referred to as "B. Braun," "Facility," or "Site") located at 901 Marcon Boulevard in Hanover Township, Lehigh County, Pennsylvania, manufactures, prepares and sterilizes plastic disposable medical devices, such as valves, adapters, piercing devices, stopcocks, infusion pumps and systems, syringes, cannulae, regional anesthesia, balloon catheters, fluid administration systems, interventional products, and safety products.

- **All of the above information is factually correct and accurate.**
2. The EI Report states that the Facility's original 285,000 square foot building was constructed in 1985, with an additional 75,000 square foot building constructed in 2009. Is the 75,000 square foot addition connected directly to the original building? How does B. Braun refer to each of the buildings (i.e. Main Building).
 - **The addition that was added in 2009 is attached to the original structure. This new construction is referred to as the Specialty Product Manufacturing (SPM) building, it is also considered Phase IV.**
 3. With respect to the Facility's elementary neutralization unit (ENU), please answer the following:
 - (A) Which building (original or addition) houses the Facility's ENU?
 - (B) When was the Facility's ENU installed?
 - (C) When did the Facility's ENU begin operation?

- a) **The part of the facility that houses the Elementary Neutralization Unit (ENU) is referred to as the Deox Room. The ENU is located in the**

Deoxx Room and it is part of the original structure. The ENU is surrounded by a dike to prevent any releases.

- b) The ENU was installed in 1985.**
- c) The ENU was also put in operation in 1985.**

4. According to the EI Report, the Facility's former Hazardous Waste Accumulation Area (HW Accumulation Area) was located on the east side of the Facility building, just outside of the main building. Please answer the following questions regarding the Facility's former HW Accumulation Area:

- (A) Please provide the dates (i.e., beginning/ending) of operation for the Facility's former HW Accumulation Area.
 - (B) Please provide a detailed description of the former HW Accumulation Area and how it was constructed (e.g., fenced, covered, concrete or gravel base, etc.)
 - (C) Please identify the types of waste and provide the EPA Hazardous Waste Code associated with the hazardous wastes stored in the former HW Accumulation Area.
- **The former Hazardous Waste Accumulation Area was located on the Southeast part of the facility off of the main building.**
 - a) **The dates of operation of the former hazardous waste accumulation area were from 1989 to 2002.**
 - b) **This structure was a hazardous material shed with a designed secondary containment to prevent any discharges into the environment. This shed is also designed to meet all Local, State, and Federal specifications. The shed was in a fenced in area to prevent unauthorized entrance into this area.**
 - c) **The types of waste and their EPA hazardous waste codes are as follows:**
 - **D001, D002 – Methylene Chloride Waste**
 - **P042 – Epinephrine Waste**
 - **D001 – Mineral Spirits, Hydraulic Oil Waste**
 - **F002, D001, F003 – Isopropyl, Methylene Chloride Waste**
 - **D001 – Aerosol Waste**
 - **D002 – Sodium Hydroxide**
 - **D001 – Paint Related Waste**
 - **D002 – Corrosive Liquid Waste**
 - **D001, D035 – Flammable Liquid Waste**

5. The EI Report states that the Facility's current hazardous waste accumulation area is located on the north end of the property adjacent to the building. Please identify which building the current HW Accumulation Area is located adjacent to. Also, please identify the types of waste and provide the EPA Hazardous Waste Code associated with the hazardous wastes stored in the Facility's current HW Accumulation Area.

- **The current hazardous waste accumulation area is on the Northeast Side of the building and is adjacent to the main building. This structure is a hazardous material shed with a designed secondary containment to prevent any discharges into the environment. This shed is also designed to meet all Local, State, and Federal specifications. This area houses the following types of waste:**

- **D001, D002 – Methylene Chloride Waste**
- **P042 – Epinephrine Waste**
- **D001 – Mineral Spirits, Hydraulic Oil Waste**
- **F002, D001, F003 – Isopropyl, Methylene Chloride Waste**
- **D001 – Aerosol Waste**
- **D002 – Sodium Hydroxide**
- **D001 – Paint Related Waste**
- **D002 – Corrosive Liquid Waste**
- **D001, D035 – Flammable Liquid Waste**

6. With respect to the Facility's use of ethylene oxide, please answer the following:

- (A) State the name of the room that is used to store raw material drums of ethylene oxide. Is this room also used for the storage of "empty" (used) ethylene oxide drums? If not, please identify the room where used drums of ethylene oxide are stored.
 - (B) Does the Facility manage the used drums of ethylene oxide as a hazardous waste (U115)? If so, please provide a detailed narrative that explains how the Facility handles and manages its used drums of ethylene oxide. In your description, please include labeling and dating of drums, how drums are moved from area to area, employee training required for handling used drums of ethylene oxide, manifesting (provide an example copy), and information regarding the entity that receives the used drums of ethylene oxide from B. Braun.
 - (C) If the Facility is not managing the used drums of ethylene oxide as a hazardous waste, please provide a detailed narrative that explains the Facility's rationale for not managing such drums as hazardous waste. If the drums are being managed as non-hazardous in accordance with a RCRA exemption or exclusion, please identify the exemption or exclusion. In addition, submit any and all supporting documentation (e.g., waste determination, EPA guidance letter, PADEP determination letter).
-
- (a) **The room that is used to store the raw or full drums of Ethylene Oxide is referred to as the Ethylene Oxide Room or Gas Room. This room is an internal confined room located inside the confines of the facility. When the drums are emptied of Ethylene Oxide they are moved to a secured dock area. This dock area is fenced and locked to prevent unauthorized entrance to the dock area.**
 - (b) **The facility does not manage the used or empty drums as a hazardous waste (U115).**
 - (c) **The empty drums are handled as a hazardous material. As per Bob Bogart of ARC/Balchem the empty drums are handled as follows, "The**

used drums are returned to the ARC Specialty Products filling site as a Hazardous Material with the proper shipping name of (RQ Residue Last Contained: UN 1040 Ethylene Oxide, 2.3, (Poison Gas), (2.1), (Flammable Gas), Hazard Zone D, Poison-Inhalation Hazard)". When received the drums are purged of remaining product and collected. Once enough material is collected, the material is sent to our manufacturing facility in Missouri as a Hazardous Material. In this facility, the ethylene oxide is used as a raw material in manufacturing as part of its normal operation.

7. Please answer the following questions regarding Tank 001, emergency catch basin UST:

- (A) Please identify where Tank 001 is located at the Facility.
- (B) Has the Facility performed a hazardous waste determination on the liquid that is removed from Tank 001 routinely? If so, please state whether or not the liquid was determined to be hazardous (include EPA HW Code) and submit any and all supporting waste determination documentation (e.g., waste profile, sampling data).
- (C) Is the liquid removed from Tank 001 at the same time the 3,000-gallon above-ground storage tank (AST) associated with the Facility's ENU is emptied? If so, are the contents of Tank 001 and the 3,000-gallon AST comingled for off-site shipment?
 - (a) Tank 001 (Underground Storage Tank UST) is located on the Northwest side of the facility. This area is also protect by a locked fenced area to prevent any unauthorized personnel from accessing this area.
 - (b) The contents (Ethylene Glycol) stored in Tank 001 does not ship as a hazardous waste, it is shipped as a hazardous material.
 - (c) During a pick up the contents of tank 001 (UST) are removed at the same time as the 3,000 gal Above Storage Tank (AST). The contents of the UST and the AST are comingled for offsite reclamation (recycled).

I trust that the enclosed information will meet your expectations. If I can be of further assistance, or if you require additional information, please do not hesitate to contact me directly at 610-596-2934.

Thank you,

Chip Marshall

Environmental, Health & Safety Specialist

B|BRAUN

Tracey *[initials]*
Bob W *[initials]*
Charlie *[initials]*
C - 94048
S 462968
APR 4099
Auth 3920
B. Braun Medical Inc.
824 Twelfth Avenue
PO Box 4027
Bethlehem, PA 18018-0027
Telephone: 610-691-5400
Telex: 610-691-2200
PA 492541
Sub 370656

April 30, 1997

Mr. Robert K. Lewis
Department of Environmental Protection (DEP)
Facility Section Supervisor, Northeast Regional Office
2 Public Square
Wilkes Barre, PA 18711-0790

Dear Mr. Lewis,

| | |
|------------------|---|
| WASTE MANAGEMENT | |
| COUNTY: | LEHIGH |
| MAY 12 1997 | |
| FACILITY: | B. Braun |
| FILE CODE: | Application Permit by Rule PA 0982679169 |

It has been brought to B. Braun's attention by the local DEP office that B. Braun is required to apply for a Permit By Rule because of the neutralization process of Ethylene Glycol (25 PA CODE 265.433--Neutralization Treatment Units). A description of the neutralization process is herein, per your request. The neutralization waste is hazardous (40 CFR 261.10) because of the corrosivity of the mixture (20% ethylene glycol, 80% water). Before neutralization, the mixture has a pH of .5-1.0. The ethylene glycol/water mixture is then treated with sodium hydroxide to establish and maintain a pH of 7. After neutralization, the ethylene glycol/water mixture is non-hazardous and taken off-site by American Chemical Exchange (ACE).

B. Braun steps undertaken in the compliance with 25 PA CODE 265.433--Neutralization Treatment Units: B. Braun Medical has a NPDES (National Pollutant Discharge Elimination System) permit with the Borough of Catasauqua (265.433 (2) and has an EPA ID number with the EPA (264.11). The neutralization unit is located within the building which requires card access to the building and card access to the area of the neutralization unit (264.14). A preventative maintenance program is maintained for the entire sterilization area and retained at the facility (264.15). All operating records are kept at the facility (264.73). B. Braun will file a biennial report by March 1, 1998, if as a large quantity generator B. Braun generates more than 2,200 lbs. of hazardous waste in any one month of the reporting year (264.75). Additional reports are filed, if necessary (264.77). The criteria for Chapter 264, Subchapters C & D; and Chapter 265, Subchapter Q, have been complied with as stated in the regulation.

Attached please find a schematic of the neutralization process and a detailed description of the neutralization process and its purpose. I am looking forward to your response regarding acknowledgement of B. Braun's neutralization treatment process. If you have any question regarding this matter, please feel free to contact myself at (610) 691-5400 or Steve Stancick, Sterilization Manager, at (610) 266-0500.

Sincerely,

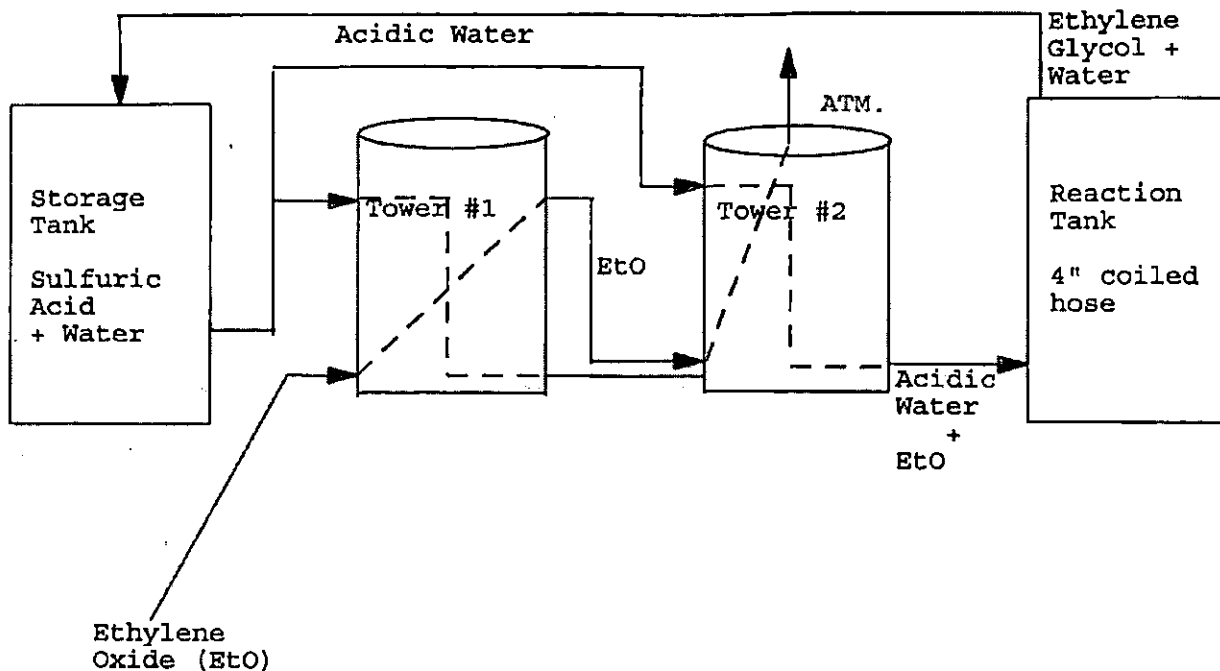
Lisa M. Millington

Lisa M. Millington
Environmental Affairs Coordinator

cc: H. Morrison
Dr. L. Lucas
D. Calek

S. Stancick

DEOXX SCRUBBER SYSTEM



Ethylene Oxide Gas Stream enters bottom of Tower #1.
Acidic water enters top of Towers 1/2.
Entrapment occurs when Ethylene Oxide mixes with acidic water.
Added efficiency occurs thru Tower #2.
Final EtO/Acidic Water mixture goes to Reaction Tank.
Mixing of EtO/Acidic Water converts mixture to ethylene glycol + water.
Ethylene Glycol Mixture is recirculated back to the Storage tank.
Storage Tank Liquid is reused until tank is full or concentration reaches 50%.

AGREEMENT

This Agreement between American Chemical Exchange Company, Inc. and Burron Medical (Generator) sets forth the terms and conditions under which American Chemical Exchange agrees to pay the Generator for removal of the ethylene glycol mixture (Mixture) produced as a by-product of Generator's ethylene oxide sterilization emissions control systems.

1. **Notifications:** All notifications and correspondence in regards to the terms and conditions of this Agreement will be made to:

American Chemical Exchange Co., Inc.
9847 Hibiscus Court
Alta Loma, California 91701
Attn: Robert Somerman
909-484-2542

DIONNE Hill
FAX: 909-987-9798

Generator: Burron Medical
904 Postal Road
Allentown, PA 18103
Attn: Steve Stancick
610-226-0500

All notifications and changes to this Agreement will be made in writing.

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2. **Charge or Payment Terms:** *BB 1/6/97* Current 12/96
400-4500 gallons
Allentown, PA 2,500 gallons 0/gallon

Pricing: If the market price of Ethylene Glycol increases, the payment to the Generator will be increased. If the market price decreases, a similar adjustment will be made. Pricing will be calculated from spot market prices and will be adjusted as a percentage of that price. Notification of price changes will be made in writing.

Demurrage Charges: Generator will be responsible for all Demurrage charges resulting from any Generator related occurrence that delays or prevents the loading of the mixture 2 hours after the tanker truck has arrived. The Demurrage charges will be \$80.00 per hour.

Cancellation Charges: The Generator will be responsible for any cancellation charges resulting from any Generator occurrence that would prevent a tanker truck from arriving on the day scheduled. Cancellation charges will total \$ 225.00 per occurrence.

Additional Charges: Because Mixture is a by-product of a manufacturing process, American Chemical Exchange acknowledges that the specifications of the Mixture, including the pH and the concentration of ethylene glycol of the Mixture will vary from lot to lot. However, sufficient testing has been conducted to determine that the total ethylene glycol (mono, di & tri-) concentration will average between 40% and 60% *BB 1/6/97* and that the normal operating conditions will result in a Mixture with this concentration.

For Concentrations less than 20% glycol, freight plus a flat fee of \$500.00 will be charged. The pH of the Mixture prior to neutralization will normally be less than 1.5. Most state and federal transportation regulations require that the pH be greater than 2.0 but not greater than 11.5. Therefore, to include a safety factor, Generator will neutralize the Mixture to a pH of approximately 7.0.

3

Generator will not ship any Mixture that for any reason has become contaminated with any substance not normally produced by the emission control or neutralization process. Upon arrival to the shipping point if the material is determined to be contaminated with a foreign substance not associated with emission control or neutralization processes, the material will be sent back to the Generator freight collect, for both directions. In order to avoid guesswork and additional costs, it is strongly recommended that samples be prepared and sent to Gabriel Labs, 114221 N. Elston Ave., Chicago, IL 60622. Attention: Donna Panek. Please label sample material with appropriate information, name of Generator, address and date. Please also note that results should be sent to **American Chemical Exchange**.

3. **Compliance:** Both parties will comply with all applicable laws, statutes, rules and regulations concerning use, handling and transportation. According to CFR guidelines parts 261.2 (e) & (f).
4. **Material Safety Data Sheet:** Upon request, **American Chemical Exchange** will provide Generator with a Material Safety Data Sheet (MSDS) for each lot of Mixture.
5. **Disclaimer of Warranties:** Generator makes no warranty, either expressed or implied, including any warranty of fitness for a particular or intended purpose of merchantability.
6. **Hold Harmless:** **American Chemical Exchange** will indemnify and hold Generator harmless from and against any and all claims, actions, charges, suites, liabilities, losses, costs and expenses, including reasonable attorneys' fees, resulting from the purchase, use or transportation of the Mixture or of any product made from the Mixture composition as defined in Additional Charges in Section 2.
7. **Insurance:** All transporters and processors contracted by **American Chemical Exchange** to haul and use the Mixture maintain vehicle and liability insurance coverage in an amount no less than \$1,000,000 per occurrence and Workmen's Compensation as required by statute.

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8. **Facilities, Personnel & Equipment:** On days of shipments, Generator's facilities and personnel will assist driver in pumping the Mixture into the tank truck. The tank trucks we dispatch will provide 20-40 feet of hose and a pump. American Chemical Exchange will provide adequate hose for hook up from Generator equipment to transfer.

9. **Terms & Termination:** This Agreement shall remain in effect until terminated by either party upon 60 days prior written notice.

AMERICAN CHEMICAL EXCHANGE CO., INC.

By: 

Robert Somerman

Date: 1/6/96

BURRON MEDICAL

By: 

Steve Stancick

Date: 1/6/96

Addendum to Agreement

1. **Use:** The material from DeOxx will be used in the manufacture of:
- a. Automobile Coolants
 - b. Herbicides
 - c. Fire Extinguishing Fluids

STRAIGHT BILL OF LADING
ORIGINAL - NOT NEGOTIABLE

Shipper No. 20103

Carrier No. _____

Date 3/18/97

STAINLESS TRANSPORT / NAPPI
(NAME OF CARRIER)

TO: AMERICAN Chemical Exchange
CONSIGNEE
BASS Oil
136 Morgan Ave
Brooklyn, NY

FROM:
SHIPPER BURRON MEDICAL INC.
904 POSTAL ROAD
ALLENTOWN, PA 18103

ROUTE FOOD STUFF - EDIBLE PRODUCT

| NO. SHIPPING UNITS | QTY. | Kind of Packaging, Description of Articles, Special Marks and Exceptions | WEIGHT (Subject to Correction) | RATE | CHARGES |
|--------------------|---------|--|--------------------------------|------|---------|
| 4478 | Gallons | Ethylene Glycol/Water mixture NON HAZARDOUS | | | |
| | | FAK TRF ITEM TRF ITEM | | | |

REMIT BURRON MEDICAL INC.
C.O.D. TO: 824 12th AVE.
ADDRESS BETHLEHEM, PA. 18018

COD Amt: \$

C.O.D. FEE:
PREPAID ☐ \$
COLLECT ☐ \$

Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

TOTAL CHARGES: \$

FREIGHT CHARGES
FREIGHT PREPAID ☐ Check here
Freight collect ☐ if charges are
to be collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER:
BURRON MEDICAL INC.
904 POSTAL ROAD
ALLENTOWN, PA 18103

CARRIER NAPPI

PER R. Smith

DATE 3-18-97

PER

LEHIGH BUSINESS FORMS, INC. (215) 821-0900 FAX (215) 821-8862



Nappi Trucking Corporation

MATAWAN, N.J. • (908) 566-3000

BILL OF LADING

No. 75640

| | | | | | | | | | |
|---|--------------|-----------------------|--|----------------------------|-------------------|--------------------------------------|---|--|--|
| SHIPPER B. BRAUN MEDICAL | | | ADDRESS 904 POSTAL ROAD | | | PRE-PAID <input type="checkbox"/> | | | |
| ORIGIN CITY & STATE ALLENTOWN PA | | | | | | MANIFEST NO. | | | |
| DRIVER EMMETT | | TIME OUT 0630 | | TRACTOR 914 | | TRAILER W217 | | CONTAINER | |
| CONSIGNEE BASS OIL | | | | ADDRESS 136 MORGAN AVE. | | | DATE SHIPPED 03/18/97 | | |
| DESTINATION CITY & STATE BROOKLYN NY | | | | | | DEL. DATE 3/197 | | CUSTOMER'S NO. | |
| ACCT. OF STAINLESS | | | P.O. | | PRODUCT GLYCOL | | QUANTITY ORDERED 4478 GAL | | |
| COMP | LOADING TEMP | HM | TARIFF COMMODITY DESCRIPTION | | | | QUANTITY | PER CUSTOMER REQUIREMENTS | |
| 1 | | | GLYCOL, ETHYLENE/WATER G | | | | | | |
| | | | NON HAZ. | | | | T 32620 | | |
| | | | | | | | N | | |
| LOADING TRACTOR | | | L 0905 To 1040 CHECK IN - LOADED - CHECK OUT | | | | | | |
| OUT | DATE 3-18 | MILITARY TIME 1040 | EXPLAIN EACH FUNCTION TO THE NEAREST 1/4 HOUR | | | | DROPPED FOR LOADING <input type="checkbox"/> | PUBLIC SCALES <input checked="" type="checkbox"/> LOAD <input type="checkbox"/> UNLOAD CARRIER'S LOAD UNLOAD S/S PUMP <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> <input type="checkbox"/> VACUUM <input type="checkbox"/> CARRIER'S HOSE FEET <input type="checkbox"/> S/S/CHEM SOLV. TEFLON VITON <input type="checkbox"/> TANK CLEANED This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. If shipment is waste material, shipper is responsible for identifying and selecting sites which are properly permitted and may legally accept the waste. Nappi Trucking Corporation has not participated in the selection of site. | |
| IN | DATE 3-18 | MILITARY TIME 0905 | | | | | DROPPED FOR UNLOADING <input type="checkbox"/> | | |
| UNLOADING TRACTOR | | | UNLOADING | | | | | | |
| OUT | DATE | MILITARY TIME | RECEIVED THE DESCRIBED PROPERTY IN GOOD CONDITION EXCEPT AS NOTED | | | | | | |
| IN | DATE | MILITARY TIME | FIRM _____ BY _____ SHOW COMPLETE CONSIGNEE NAME AND SIGNATURE | | | | | | |
| DOCS | | | I HAVE CHECKED THE DOCUMENTS PERTAINING TO THIS SHIPMENT, AND HAVE FURNISHED INSTRUCTIONS TO THE DRIVER FOR UNLOADING. | | | | | | |
| | | | TIME _____ DATE _____ SIGNED _____ | | | | | | |

| | | | | | | | |
|-------------------|-------------|------|---------|---------------|----------|----------|-----------|
| TERMINATION POINT | MATAWAN, NJ | DATE | 3-18-97 | MILITARY TIME | EMP. NO. | DRIVER | R Emmett |
| STARTING POINT | MATAWAN, NJ | DATE | 3-18-97 | MILITARY TIME | 0630 | EMP. NO. | CO-DRIVER |

| | |
|--|--|
| | |
| | |
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| | |

This Memorandum

IS AN ACKNOWLEDGMENT THAT A BILL OF LADING HAS BEEN ISSUED AND IS NOT THE ORIGINAL BILL OF LADING, NOR A COPY OR DUPLICATE, COVERING THE PROPERTY NAMED HEREIN, AND IS INTENDED SOLELY FOR FILING OR RECORD.

Shipper No. 20101

Carrier No. _____

Date 11/1/76

BURRON MEDICAL INC.
(NAME OF CARRIER)

TO:
CONSIGNEE

FROM:
SHIPPER
BURRON MEDICAL INC.
904 POSTAL ROAD
ALLENTOWN, PA 18103

ROUTE

FOOD STUFF - EDIBLE PRODUCT

| NO. SHIPPING UNITS | QTY. | Kind of Packaging, Description of Articles, Special Marks and Exceptions | WEIGHT (Subject to Correction) | RATE | CHARGES |
|--------------------|-----------------|--|--------------------------------|------|---------|
| | 4385 Gallons | Edible stuff / food products NON PERISHABLES | | | |
| | | FAK TRF ITEM TRF ITEM | | | |

REMIT BURRON MEDICAL INC.
C.O.D. TO: 824 12TH AVE
ADDRESS BETHLEHEM, PA 18018

COD

Amt: \$

C.O.D. FEE:
PREPAID ☐ \$
COLLECT ☐ \$

TOTAL CHARGES: \$

Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor.)

FREIGHT CHARGES
FREIGHT PREPAID ☐ Check box if charges are to be collect
except when box is right is checked

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER:

BURRON MEDICAL INC.
904 POSTAL ROAD
ALLENTOWN, PA 18103

CARRIER C I T

PER Ed. H. J.

DATE 11-01-76

PER

| | | | | | | | |
|---|--|---|--|---|--|--|--|
| SHIPPER | | BURREN MEDICAL INC | | 904 POSTAL ROAD | | 2419522 ORC | |
| SID # | | C/O | | ALLENTOWN PA 18103 | | 141294 TRV | |
| SCH PICKUP 0900 | | DATE 11-01 | | | | 065/M E-TE | |
| ENTER PLANT 09:00 | | DATE 11-01 | | | | WEIGHT | |
| START LOAD | | | | | | G | |
| END LOAD | | | | TRAILER SPOTTED TO LOAD YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | | T | |
| DEPART PLANT 10:30 | | DATE 11-01 | | SHIPPER AGENT SIGNATURE <i>[Signature]</i> | | DRIVER SIGNATURE <i>[Signature]</i> | |
| TOTAL TIME 1 1/2 | | DATE | | TIME | | DATE 11-1 | |
| RECEIVER | | C P SERVICES INC | | RAIL FACILITY | | ACCESSORIAL CHARGES | |
| RID # RAM1486 | | C/O | | TAYLOR PA 18517 | | MARK Y IF USED N IF NOT USED | |
| I HAVE CHECKED THE DOCUMENTS FOR THIS SHIPMENT AND VERIFY THAT THERE IS ADEQUATE STORAGE ROOM TO RECEIVE THIS SHIPMENT AND CONNECTION HAS BEEN MADE TO THE PROPER STORAGE FACILITY. | | | | | | CONSIGNEE DATE | |
| SCH. DEL AS | | DATE 11-01 | | | | PUMP LOAD <input type="checkbox"/> ES | |
| ENTER PLANT | | DATE 11-01 | | | | COMPRESSOR <input type="checkbox"/> | |
| START UNLOAD | | | | | | PUMP UNLOAD <input type="checkbox"/> SS | |
| END UNLOAD | | | | | | BLOWER <input type="checkbox"/> | |
| DEPART PLANT | | DATE 11-01 | | RECEIVER AGENT SIGNATURE | | DRIVER SIGNATURE <i>[Signature]</i> | |
| TOTAL TIME | | DATE | | TIME | | DATE 11-1 | |
| COMP H/M | | COMMODITY AND HAZARDOUS MATERIAL DESCRIPTION (MUST AGREE WITH DESCRIPTION ON SHIPPING ORDER) | | | | QUANTITY | |
| 1 1/4 | | ETHYLENE GLYCOL / WATER MIXTURE | | | | 4385 GALS | |
| | | | | | | LOAD TEMP | |
| | | | | | | TOLLS \$ | |
| | | | | | | TRANSFER SCALE - | |
| | | | | | | RAIL TRANSFER LBS | |
| | | | | | | TRACTOR NUMBERS | |
| | | | | | | PRELOAD | |
| | | | | | | LINE HAUL 2693 | |
| | | | | | | RELAY 1 | |
| | | | | | | RELAY 2 | |
| | | | | | | UNLOAD BY 2693 | |
| | | | | | | ONE WAY MILES | |
| INSTRUCTIONS | | | | | | WEIGH HEAVY & LITE AT SKYLINER TRUCK STOP UNLOAD INTO RAIL CAR | |
| | | | | | | ACFX 88920... SEE ED HOTTINGER AT B BRAUN MEDICAL. | |
| | | | | | | PAGER 610-305-1312 | |
| | | | | | | CUST PHONE 610-266-0500 EXT # 2352 | |
| REMARKS | | | | | | WAS ALL OF PRODUCT DELIVERED/RECEIVED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF NO EXPLAIN: | |
| | | | | | | RECEIVER IS RESPONSIBLE FOR DETERMINING THAT ALL PRODUCT IS REMOVED FROM TRAILER | |
| | | | | | | ETHYLENE GLYCOL 403221 | |
| | | | | | | 74.56 TRAIL | |
| | | | | | | CHASS | |
| | | | | | | CONTAIN | |
| | | | | | | TERM PROCESSING REVENUE PAPER | |
| | | | | | | PERSON COMPLETING MANIFEST | |
| CHEMTREC EMERGENCY HELP NUMBER - 1-800-424-9300 | | | | | | | |
| ENDING PT. <i>Taylor</i> | | CITY <i>Pa.</i> | | STATE <i>Pa.</i> | | ENDING ODOMETER READING | |
| STARTING PT. <i>Greenville</i> | | CITY <i>Pa.</i> | | STATE <i>Pa.</i> | | STARTING ODOMETER READING 56316 | |
| | | | | DATE 11-01 | | TIME 06:45 | |
| | | | | DRIVER 1 <i>[Signature]</i> | | MAN NO. 2887 | |
| | | | | DRIVER 2 <i>[Signature]</i> | | MAN NO. | |
| STATE CODE | | FIRST CITY IN STATE OR MAJOR CHANGE IN DIRECTION | | STATE CODE | | FIRST CITY IN STATE OR MAJOR CHANGE IN DIRECTION | |
| PA | | Fogelsville | | PA | | Fogelsville | |
| | | Allentown | | | | Allentown | |
| | | Catskill | | | | Catskill | |
| | | Troy | | | | Troy | |
| | | | | | | CLEANING POINT | |
| | | | | | | N/A | |
| | | | | | | ATTACHING FUEL & TOLL RECEIPTS TO FUEL PURCHASES | |
| | | | | | | GAL VENDOR INVOIC NO. | |